



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: POLREP #19
Progress
Pilsen Soil Operable Unit 2 Residential
C5N8RV02
Chicago, IL

To: Bruce Everetts, Illinois EPA
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From: Ramon Mendoza, On-Scene Coordinator

Date: 7/5/2018

Reporting Period: 6/15/2018 to 7/5/2018

1. Introduction

1.1 Background

Site Number:	C5N8RV02	Contract Number:	
D.O. Number:		Action Memo Date:	8/3/2015
Response Authority:	CERCLA	Response Type:	Time-Critical
Response Lead:	PRP	Incident Category:	Removal Action
NPL Status:	Non NPL	Operable Unit:	2
Mobilization Date:	12/19/2016	Start Date:	12/20/2016
Demob Date:		Completion Date:	
CERCLIS ID:	ILN000504472	RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:		Reimbursable Account #:	

1.1.1 Incident Category

This time critical removal action is a PRP lead under an EPA Unilateral Administrative Order.

1.1.2 Site Description

Pilsen Soil Operable Unit 2 (OU2) Residential Site : Operable Unit (OU) 2 is a residential area bounded by West 18th Place to the north, a north-south alley between South Allport Street and South Racine Avenue to the east, West 21st Street to the south, and South Loomis Street to the west. There are about 178 residential properties in this 25-acre OU2 site. About 116 of the properties have non-permanent covers in their yards such as bare soil, grass or gravel and are the focus of EPA actions. In 2010, approximately 1,563 people lived within the boundaries of the Site, and the residential yards have high accessibility to sensitive populations including young children and pregnant women.

1.1.2.1 Location Chicago, Illinois 60608

See Site Description

1.1.2.2 Description of Threat

The lead concentration in surfaces soils are above the EPA screening level of 400 mg/kg lead in residential yards and gardens. Residents living in these homes may be exposed to the lead in these surface soils.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA conducted Site Assessment activities in 2013 to 2015 with additional residential parcels sampled in 2016. Additional residential parcels have also been sampled in 2017 to 2018. Lead was found in surface soils in the residential yards and gardens above the EPA removal management level of 400 parts per million. The average Site surface soil lead concentrations were 1,412 mg/kg. There is an estimated population of around 1,563 people including children living, walking, working, and playing on the contaminated surface soils in the Site. These people have a high accessibility to residential yards including sensitive populations such as young children and pregnant women. EPA's risk assessment concluded that the soil concentrations of lead at the Site are at an unacceptable risk level to the residents accessing the Site.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Initial residential soil cleanup work was conducted from, Dec. 20 - 23, 2016. After taking a break during the winter season, residential yard cleanup was restarted on April 24, 2017 and continued through December 22, 2017. After another break during the winter season, residential yard cleanup was restarted again this year on April 17, 2018. EPA OSC and START provided part time oversight of removal activities on site, collected soil samples as needed, and conducted XRF analysis as needed. GHD (H.Kramer's contractor) had representatives on-site to oversee the removal work. Removal work was also conducted by GHD's contractor RW Collins. START or EPA OSC documented property specific removal activities by recording field notes and by taking photographs. Air monitoring as required by OSHA was conducted by GHD.

2.1.2 Response Actions to Date:

H. Kramer contractors conducted response actions on Dec. 2016 and April - Dec. 2017. During this period H. Kramer conducted response actions in 54 residences. During this period, several owners provided consent for access for sampling and cleanup of their homes. Response actions for the aforementioned 54 homes are documented in previous pollution reports: POLREPs 1 to 15.

Work was conducted after H. Kramer's contractor (GHD) contacted the owners and agreed on a scope of work in writing. Below is a removal status summary of each of the properties. All properties were 3-4 ft. below the street level with limited access, which made excavation work more difficult and time consuming. GHD conducted project management, particulate air monitoring during excavation and backfill activities at the residential and soil staging areas. RW Collins contractor/laborers conducted the physical work of excavation and backfilling of soil and also managed the soil at the H. Kramer property staging area.

In general, unless noted for each home, lead contaminated soil was excavated by hand with shovels and fed into a vacuum hose to the vacuum truck. Yards were excavated down to 1 ft and gardens down to 2 ft below the surface. After it was filled the truck was driven to the soil staging area at H. Kramer's truck yard and the soil was transferred to steel containers, which are then transported for disposal to a solid waste landfill (Waste Management, Laraway) in Joliet IL. For backfilling, clean soil was transferred from the flatbed truck to the yard by conveyor belts, shovels and wheelbarrows to backfill. An orange fence marker was placed at the bottom of the excavation before backfilling. Final surface cover could be gravel, soil, or sod (new grass), depending on the owner preference.

Air monitoring at the homes and staging area did not show violations of the OSHA PEL criteria during this reporting period. Workers wore level D with rubber booties and gloves during excavation of lead contaminated. GHD provided a boot wash to protect workers and minimize soil migration outside of the work area.

EPA OSC met (4/12/2018) with the Chief of Staff for Alderman Solis to let them know cleanup was restarting again at the Site. EPA was briefed on most recent gang activity for the purpose of keeping cleanup crews safe. Information was passed on to H. Kramer's contractors (GHD and RW Collins).

Response actions were conducted by H. Kramer contractors from 4/16/18 to 6/14/2018. During this period, response actions were completed at nine homes (plus two homes had additional work and completed from 2017 at request of owners). Sampling was conducted at one home and XRF screening was conducted at two homes during this period. These activities are documented in POLREP 16 to 18.

Response Actions taken from taken at the the following homes from 6/15/2018 to 7/5/2018. No work was conducted on 6/21 and 6/22/2018 due to heavy rains. All work was conducted with approval from the owners. Response actions were completed at two homes during this period:

Home at Non-Responsive - 06/13 to 06/28/18 - Complete - This property is comprised of two parcels, one open parcel and one parcel with a house. The crew began work excavating in the backyard behind the house on 6/13/2018. Excavation of this area was completed on 6/14/2018 and the crew began backfilling this portion of the property on 6/15/2018. The crew began excavating the open parcel on 6/18/2018 utilizing an excavator and bobcat. The excavator and bobcat accessed the property through the fence along the alleyway to the north of the property which was opened by the crew. Excavation of the open parcel including the garden area was completed on 6/19/2018. The backyard areas were excavated to 1 foot bgs as feasible. The garden area was excavated to 2 feet bgs. Backfilling operations with clean soil in the open lot area began on 6/20/2018. No activities were conducted at this property from 6/21 to 6/22/2018 due to heavy rain. Backfilling and grading continued on 6/25/2018 and was completed on 6/26/2018. Sod was placed over the clean soil backfill with the exception of the garden area from 6/26/2018 to 6/28/2018. Restoration of the property was completed on 6/28/2018 when the fence along the alleyway was replaced.

Home at Non-Responsive - 06/19 to 06/26/18 Complete - This property is located just to the east of the other home located at Non-Responsive and has only a backyard. The crews accessed this property through the fence located between the two properties. The crews began excavating the backyard of this property on 6/19/2018 utilizing an excavator and bobcat. Excavation was completed to 1 foot bgs on 6/20/2018. Backfilling operations with clean soil began on 6/20/2018. No activities were conducted at this property from 6/21 to 6/22/2018 due to heavy rain. Backfilling and grading continued on 6/25/2018 and was completed on 6/26/2018. Sod was placed over the clean soil backfill 6/26/2018. Restoration of the property was completed on 6/26/2018 when the fence between the yards of the two W. 19th St. properties was replaced.

Home at Non-Responsive - 06/29/18 - On-Going - Previous XRF screening conducted on 5/25/2018 indicated soil in the backyard area contained lead in concentrations above the EPA residential lead action level of 400 mg/kg and therefore required removal. The XRF data confirm EPA lab results from 2013. The crew began excavation in the backyard of the property on 6/29/2018. The backyard will be excavated to a depth of 1 foot bgs. As of the date of this POLREP excavation and backfill work in the backyard of this property is complete and sodding is planned.

Home at Non-Responsive 07/03/18 - On-Going - Excavation is complete and backfilling with gravel is ongoing.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

During EPA's Removal Site Evaluation (2013-14), H. Kramer & Co. was identified as a significant contributor to the lead found in surface soils in the residential parcels at the Site, due to historical fugitive air emissions of dust which contained lead (slag and zinc oxide). The response work is being overseen by EPA/START contractor and is being conducted by H. Kramer's contractors under a Unilateral Administrative Order (UAO) issued by the USEPA (Sept. 2016). Previous sampling work was conducted from April to June 2016 by H. Kramer's contractors at the Site under

an EPA (CERCLA Administrative Order on Consent; to determine the amount of homes above the lead screening level of 400 mg/kg which needed to be cleaned up.

2.1.4 Progress Metrics :

As of June 29, 2018, 67 residential parcels have undergone cleanup and completed or have been removed from the cleanup list.

During the reporting period as of June 29, 2018, 189.91 tons of lead contaminated soil was disposed. H Kramer's contractors have disposed of 1138.01 tons of non-hazardous lead contaminated soil to the solid waste landfill facility in Joliet, IL.; since excavations of parcels were initiated in Dec. 2016.

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity (in tons)</i>	<i>Manifest/Ticket#</i>	<i>Treatment</i>	<i>Ship Date</i>	<i>Disposal Facility</i>
Soil		10.16	851385		12/22/2016	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.42	889972		4/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.98	890592		4/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.39	891212		4/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		7.95	894904		5/8/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.98	896484		5/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.78	898993		5/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.71	900453		5/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.89	900819		5/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.49	901772		5/23/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.92	902005		5/23/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.66	902633		5/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.65	904544		5/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.78	904744		5/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.69	915148		6/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.51	912918		6/20/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.71	923037		7/17/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.29	923543		7/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.56	925351		7/21/2017	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		13.33	925625		7/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.62	926172		7/25/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.09	926615		7/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.76	927883		7/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.66	933810		8/14/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.47	935594		8/17/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.76	941816		8/29/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.33	940041		9/1/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.09	941952		9/5/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.16	945518		9/6/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.14	945956		9/12/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.12	946578		9/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.39	94880		9/18/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.12	959184		9/20/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.69	951525		9/22/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.51	953264		9/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.95	961224		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		18.71	961440		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		18.48	961668		10/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.39	963390		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.12	963391		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.15	963537		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.

Soil		17.77	963538		10/13/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		19.9	963853		10/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.5	966082		10/19/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.19	967586		10/24/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.98	968461		10/26/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.1	969072		10/27/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.89	970192		10/30/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.73	970505		10/30/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.37	970785		10/31/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.82	976978		11/10/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.11	980304		11/16/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.19	985773		11/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.7	985773		11/28/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.19	985957		11/29/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.94	988543		12/4/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.23	990500		12/6/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.16	992436		12/8/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.74	996636		12/15/2017	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.84	1032003		4/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.79	1033160		4/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.2	1034605		4/24/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.8	1035962		4/26/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.33	1037089		4/30/2018	Laraway RDF, Waste Management,

						Joliet, IL.
Soil		13.14	1042278		5/10/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.74	1042844		5/11/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.53	1046546		5/22/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		15.12	1046690		5/23/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.30	1048833		5/30/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		16.24	1049275		5/31/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		13.74	1054620		6/12/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		14.79	1056793		6/15/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.31	1057862		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.92	1057974		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		8.03	1057990		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		12.9	1058124		6/18/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.07	1058426		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.74	1058479		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.52	1058490		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.33	1058496		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.76	1058768		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.46	1058801		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		10.95	1058813		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.

Soil		7.77	1058837		6/19/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		8.68	1059174		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		11.03	1059180		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		9.81	1059204		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		8.09	1059218		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Soil		2.01	1059491		6/20/2018	Laraway RDF, Waste Management, Joliet, IL.
Total		1138.01				

2.2 Planning Section

2.2.1 Anticipated Activities

2.2.1.1 Planned Response Activities

Cleanup is on-going, soil is being excavated and replaced with clean soil and sod or gravel depending on the owner preference. As of July 5, 2018, There are only 3 more homes left to clean up. One more owner on 19th St. turned in a consent for access form on July 3 which was received by GHD onsite. If remediated the total number of parcels cleaned up by H. Kramer will stand at 70 at this time.

2.2.1.2 Next Steps:

GHD and RW Collins are working to cleanup the 3 more homes on their list. EPA and START contractor will continue to oversee the work to ensure compliance with the EPA Order. (Soil samples were collected by EPA START and GHD contractors at the aforementioned home on 19th St). XRF results indicated 874mg/kg for lead. Lab results are pending next Monday. We anticipate cleanup at this home and plans are being made by GHD and RW Collins.

2.2.2 Issues :

OSC worked with the alderman's office to ensure crews are not ticketed (Parking violations) when working to cleanup the homes in the neighborhood.

2.3 Logistics Section

Work this period was supported by 4 laborers (includes one operator), an additional 2 operators, a foreman, technical engineer, EPA START contractor, and EPA OSC.

Equipment includes one pickup truck, one dump truck, one skid steer, two 20 yard containers, one soil vac truck, three 10 foot conveyor belts, and hand dig tools. Work this period was additionally supported by an excavator, a bobcat, and haul trucks that were direct loaded to haul excavated soil off-site.

2.4 Finance Section

2.4.1 Narrative

The START total budget ceiling is currently \$120,000. Of this amount a total of \$99,640.15 (as of June 22, 2018) has been spent overseeing the responsible party contractor removal activities, overseeing responsible party contractor sampling activities, and collecting/analyzing soil samples under the EPA Administrative Order on Consent. Additional funds were utilized for technical support for the Unilateral Administrative Order for the Site. This additional budget is estimated to fund START's continued oversight work and cleanup support through July 2018.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
TAT/START	\$120,000.00	\$99,640.15	\$20,359.85	16.97%

Intramural Costs				
Total Site Costs	\$120,000.00	\$99,640.15	\$20,359.85	16.97%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

Ramon Mendoza, EPA OSC, (with EPA START supporting);
Walt Pochron, Ivan Navarro; GHD (H. Kramer contractor)

2.5.2 Liaison Officer

EPA Community Relations: Heriberto Leon

2.5.3 Information Officer

EPA PIO: Francisco Arcaute, Rachel Bassler

3. Participating Entities

3.1 Unified Command

None

3.2 Cooperating Agencies

City of Chicago, Alderman Solis Office
City of Chicago Dept. of Public Health;
Illinois EPA
ATSDR

4. Personnel On Site

Pilsen OU2 Removal – Personnel Counts Notes: START is EPA's oversight contractor GHD and RW Collins are H. Kramer Contractors.					
Date	EPA	GHD	RW Collins	EPA/START	
6/18 to 7/5/2018	1 OSC (not onsite at all times)	1	5	1 (present onsite, supporting EPA OSC oversight)	

5. Definition of Terms

N/A

6. Additional sources of information

6.1 Internet location of additional information/report

<https://www.epa.gov/il/pilsen-area-soil-site>

6.2 Reporting Schedule

POLREPS will be issued every two weeks as appropriate.

7. Situational Reference Materials

See link for the Site at: <https://www.epa.gov/il/pilsen-area-soil-site>





